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5	Attorneys for Marc J. Randazza, Jennifer Randazza, and Natalia Randazza		
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7	UNITED STATES DISTRICT COURT		
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8	DISTRICT OI	FNEVADA	
´		FNEVADA	
8	MARC J. RANDAZZA, an individual;	F NEVADA Case No. 2:12-	
8 9 10			
8	MARC J. RANDAZZA, an individual; JENNIFER RANDAZZA, an individual; NATALIA RANDAZZA, a minor,		
8 9 10	MARC J. RANDAZZA, an individual; JENNIFER RANDAZZA, an individual;		
8 9 10 11	MARC J. RANDAZZA, an individual; JENNIFER RANDAZZA, an individual; NATALIA RANDAZZA, a minor,		

Defendant.

Case No. 2:12-CV-02040-JAD-BNW

STATUS REPORT

Plaintiffs Marc J. Randazza, Jennifer L. Randazza, and Natalia Randazza ("Plaintiffs") file their status report pursuant to this Court's Minute Order dated March 22, 2022 (ECF No. 314) relating to the status of bankruptcy proceedings. Specifically, that Order directed:

that the parties must file a status report to the court every 90 days, beginning April 1, 2022, to advise of the status of the bankruptcy proceedings. Based on the status of this case, the Clerk of the Court is directed to ADMINISTRATIVELY CLOSE this matter subject to reopening after the bankruptcy proceedings have concluded. ECF No. 314.

As this Court is aware, Mr. Randazza filed a petition for relief under Chapter 11 of the United States Code on August 28, 2015, in the United States Bankruptcy Court for the District of Nevada, Case No. BK-S-15-14956-abl. *See* ECF No. 295. Defendant Cox's counterclaims were referred to the bankruptcy court. *See* ECF No. 307.

- 1 -Status Report 2:12-CV-02040-JAD-BNW Mr. Randazza filed an adversary complaint against Defendant Cox in the bankruptcy court objecting to Defendant Cox's proof of claim, seeking declaratory relief as to dischargeability, and bringing a claim against Defendant Cox for abuse of process. *See Marc John Randazza v. Crystal L. Cox*, Adv. No. 16-01111, at ECF No. 6 (Bankr. D. Nev., filed Oct. 6, 2016) (first amended complaint). A default judgment was awarded in favor of Mr. Randazza and against Defendant Cox on December 6, 2017. *See* Adv. ECF No. 44. The bankruptcy court awarded Mr. Randazza compensatory damages in the amount of \$411,582.59 and punitive damages in the amount of \$41,158.00, for a total judgment in the amount of \$452,740.59. *Id*.

Proceedings in the Bankruptcy Court that will affect the proceedings in the instant matter are ongoing. Currently, Mr. Randazza is seeking relief in the Bankruptcy Court against Defendant Cox in relation to the judgment under NRS 21.320, which will allow him to reach certain property and interests of Ms. Cox that cannot be seized by a writ of execution. As part of this effort, Mr. Randazza is attempting to liquidate Defendant Cox's interests, if any, in the domains that are the subject of the preliminary injunction issued by this Court. If successful, the injunctive relief sought in this matter, that those domains be permanently transferred to Plaintiffs, will be moot.

To effectuate that motion, on March 22, 2022, the Bankruptcy Court entered an Order Granting Plaintiff's Amended *Ex-Parte* Motion to Reopen Case for Judgment Creditor to Obtain Order Pursuant to NRS 21.320. *See In Re: Marc J. Randazza*, No. BK-S-15-14956-abl, at ECF No. 346 (Bankr. D. Nev., filed Mar. 22, 2022). Two days later, on March 24, 2022, Mr. Randazza filed the motion for an order under NRS 21.320. A hearing on that motion before the Bankruptcy Court is scheduled for April 19, 2022.

¹ References to the docket in the bankruptcy adversary proceeding are hereafter referred to as "Adv. ECF No."

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Dated: April 1, 2022.	Respectfully Submitted,
	/s/ Ronald D. Green Ronald D. Green, NV Bar No. 7360 RANDAZZA LEGAL GROUP, PLLC 2764 Lake Sahara Drive, Suite 109 Las Vegas, NV 89117 Telephone: (702) 420-2001 ecf@randazza.com
	Attorney for Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza

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Case No. 2:12-cv-02040-JAD-BNW

<u>CERTIFICATE OF SERVICE</u>

I HEREBY CERTIFY that on April 1, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

I further certify that a true and correct copy of the foregoing document is being served via electronic mail to:

Additionally, a true and correct copy of the foregoing document is being served to the persons at the addresses listed below via United States mail, postage fully prepaid:

CRYSTAL L. COX C/O ELIOT BERNSTEIN 2753 NORTHWEST 34TH STREET, BOCA RATON, FL 33434

CRYSTAL L. COX P.O. BOX 2027 PORT TOWNSEND, WA 98368

> Crystal L. Cox 1000 DRUMLIN LANE PO BOX 1610 EUREKA, MT 59917

> > /s/ Ronald D. Green
> > Ronald D. Green

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